

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADVANCED ACCESS CONTENT SYSTEM
LICENSING ADMINISTRATOR, LLC,

Plaintiff,

v.

LANNY SHEN d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., SUNREG
TECHNOLOGIES LTD. d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., FENG TAO
d/b/a DVDFAB AND FENGTAO SOFTWARE
INC., SHEN XINLAN d/b/a AUDIO-DVD
CREATOR, and JOHN DOE, JANE DOE and/or
XYZ COMPANY d/b/a DVDFAB, RIPPERBLU-
RAY.COM, DVDFABB.COM and
DVDFFAB.COM,

Defendants.

Civil Action No.
14 Civ. 1112 (VSB)

**NOTICE OF MOTION FOR
RECONSIDERATION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant Feng Tao d/b/a Fengtao Software will move this Court, before the Honorable Vernon S. Broderick, on a date and time designated by the Court, for an order pursuant to Rule 59(e) of the Federal Rules of Civil Procedure and Local Rule 6.3 granting reconsideration of (1) the Court's Memorandum & Order entered March 16, 2015 (a) denying Feng's motion to vacate the Clerk's default, (b) denying Feng's motion to modify by narrowing the Preliminary Injunction entered by the Court on March 4, 2014 ("Original Injunction"), and (c) granting (in part) plaintiff's motion to modify by expanding the Original Injunction, and (2) the Amended Preliminary Injunction Order entered March 17,

2015 (the “Amended Injunction”), and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 30, 2015

**SCHOEMAN UPDIKE KAUFMAN
STERN & ASCHER LLP**

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